

March 24, 2013

Indiana Department of Environmental Management  
Office of Pollution Prevention and Technical Assistance  
MC 64-00, Room IGCS W041  
100 North Senate Avenue  
Indianapolis IN 46204-2251  
**Via Certified Mail (7009 2250 0003 9215 1813);**  
**Return Receipt Requested**

Dear ESP Program Coordinator:

Please accept the enclosed Annual Stewardship Performance Report for 2013 (encl # 1) for Raytheon Intelligence, Information and Services (IIS), Indianapolis.

Raytheon IIS is a proud member of the ESP program and looks forward to our continued partnership with IDEM and the Office of Pollution Prevention.

Please contact me directly if you have questions or need clarification on the data presented.

Sincerely,



Larry E. Bryan  
Manager Environmental, Health and Safety

Enclosures:

- Annual Stewardship Performance Report for 2013 (Encl # 1)





# INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R3 / 1-11)  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management  
Office of Pollution Prevention and Technical Assistance  
MC 64-00, Room IGCS W041  
100 North Senate Avenue  
Indianapolis, IN 46204-2251  
Telephone: (800) 988-7901  
FAX: (317) 233-5627  
E-mail: [esp@idem.IN.gov](mailto:esp@idem.IN.gov)

Please use this form if you are a member of the Indiana Environmental Stewardship Program (ESP) to report on progress toward objectives and targets AND certify ESP requirements continue to be achieved. Indiana ESP facilities must submit an Annual Performance Report (APR) by April 1<sup>st</sup> of every year, for each calendar year in which the entity has been a member for at least three (3) full months. Section C of your APR should be signed by your ISO 14001:2004 EMS Lead Auditor. Your APR should be reviewed and signed by a senior manager at your facility prior to submittal. Once signed, e-mail the APR to IDEM at [esp@idem.IN.gov](mailto:esp@idem.IN.gov). Please do not include any confidential business information in your annual performance report. Public access laws require IDEM to make the APR publicly available, which may include posting all portions of your report on the Indiana ESP Web site. If you have any questions, please contact IDEM at [esp@idem.IN.gov](mailto:esp@idem.IN.gov) or (800) 988-7901.

## SECTION A

### FACILITY INFORMATION

Name of facility  
Raytheon Intelligence, Information and Services (IIS)

Name of parent company (If applicable)  
Raytheon Company

Street address (number and street)  
6125 E 21<sup>st</sup> Street

City / State / ZIP code  
Indianapolis/ IN/ 46219

Web site of Facility/Company  
[www.raytheon.com](http://www.raytheon.com)

### CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)  
Mr. Larry Bryan

Title  
EHS Manager

Telephone number  
317-306-7447

FAX number  
317-306-7907

E-mail address  
[larry\\_e\\_bryan@raytheon.com](mailto:larry_e_bryan@raytheon.com)

Mailing address (if different from facility address)

City / State / ZIP Code

### REPORTING PERIOD

Reporting period dates (month, day, year)  
01/01/2013 - 12/31/2013

1a. Is this the third Annual Performance Report of your membership term?

☐ Yes—If yes, answer question 1b.

☒ No—If no, skip to the "Change in Information" section of this report.

1b. Do you wish to renew your Indiana Environmental Stewardship Program membership?

☐ Yes—If yes, please complete all sections of this annual report.

☐ No—If no, please complete all sections of this annual report except for Section F.

### CHANGE IN INFORMATION

In your ESP application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any changes or additions to your facility's list of products or activities?

☐ Yes—If yes, please describe them: \_\_\_\_\_

☒ No

## SECTION B

### PUBLIC OUTREACH AND PERFORMANCE REPORTING

Why do we need this information?

IDEM needs to know how environmental information was shared with the public.

What do you need to do?

Describe how the facility has shared and plans to share environmental information.

Please briefly describe the activities that your facility conducted during this reporting period to interact with the community on environmental issues and to report publicly on its environmental performance. The site conducted an EHS Awareness day. Raytheon IIS, SMS Indianapolis gave a presentation at the 16th Annual Indiana Pollution Prevention Conference and Trade Show on the Site's Rain Water Harvesting efforts. We also generated an annual EHS calendar, which the children or grandchildren of Raytheon employees submitted EHS drawings in a contest with prizes going to everyone that participated. The calendars were made available to all employees. Saplings were distributed to employees as part of the site's Earth Day activities. Additionally, this facility submitted its annual ESP performance report in 2012.

Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate.

☐ Web site (http://www. \_\_\_\_\_ ) ☐ Open house ☐ Meetings ☐ Press releases ☒ Other Available Upon Request

## SECTION C

## ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT

### Why do we need this information?

Facilities need to have implemented an EMS that meets certain criteria and use an ISO 14001:2004 EMS Lead Auditor at least every 36 months to assess the EMS.

**What do you need to do?**  
Answer the following questions about your EMS.

1. What is the most recent date that an ISO 14001:2004 EMS Lead Auditor performed an EMS assessment at your facility? August 2013

2. Is the date of the most recent EMS assessment performed by an ISO 14001:2004 EMS Lead Auditor within the past 36 months?

☒ Yes—If yes, skip to Question 3.

☐ No—If no, please have your ISO 14001:2004 EMS Lead Auditor complete and sign the following checklist, indicating whether or not your EMS meets the listed criteria for ESP membership:

- |                              |                             |   |
|------------------------------|-----------------------------|---|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Evidence of senior management support, commitment, and approval.  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Identification of the environmental aspects at the entity.  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Established priorities, and environmental objectives and targets for continuous improvement in environmental performance and for ensuring compliance with applicable environmental laws, regulations, and permit conditions. Objectives and targets must go beyond current legal requirements and specify the environmental media, types of pollution to be prevented or reduced, implementation activities, and projected time frames. |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | An established community outreach mechanism that includes identifying and responding to community concerns; informing the community of important matters that affect the community; and reporting on the EMS, including reporting to the public on the environmental policy and significant aspects.  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, taking corrective action, and ensuring compliance with applicable environmental laws, regulations, and permit conditions.   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Documentation of the implementation procedures and the results of implementation.   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Appropriate written EMS procedures.   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | An annual evaluation of the EMS with written results provided to senior management and affected employees.  |

Signature of ISO 14001:2004 EMS Lead Auditor

Date (month, day, year)

3. Were any deficiencies found during the most recent EMS assessment?

☐ No—If no, skip to Question 4.

☒ Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: See attached report from Wilcox Environmental Engineering.

4. Name, title, and organization of ISO 14001:2004 EMS Lead Auditor that conducted the most recent EMS assessment: Aaron Miller, Sr. Project Manager, Wilcox Environmental

5. What type of protocol was used to perform the independent EMS assessment?

- ☐ ISO 14001:2004 Certified audit  
☐ Responsible Care EMS audit  
☐ Responsible Care 14001 audit  
☒ ESP Independent Assessment Protocol  
☐ Other (please specify): \_\_\_\_\_

6. Is the EMS certified to a recognized standard?

☐ Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)?

- ☐ ISO 14001:2004  
☐ Responsible Care EMS  
☐ Responsible Care 14001

☒ No.

7. When was the last Senior Management review of your EMS completed?  
 Month / Year: March 2014  
 Who headed the review (name and title)? Rudolph Lewis, VP IIS & Larry Bryan, EHS Manager

8. When did your facility last conduct an internal or corporate environmental compliance audit? Do not include inspections or site visits by regulatory organizations.  
 Scope of the compliance audit: Environmental Regulations (federal & state) and Corporate Environmental Protocols  
 Month(s) / Year(s): November 2010  
 Who conducted the audit(s) (e.g., facility staff, corporate, third party)? Raytheon EHS Corporate Audit Team

9. Explain the emergencies experienced within the facility during the past year. Were the applicable emergency and contingency plans detailed in the EMS effective? What changes, if any, have been made to your facility's emergency or contingency plans?  
 An incident was reported (IDEM Incident Number 34337) to the IDEM from a cooling tower waste release. The incident was managed appropriately with no violations being issued. No changes were made to the site's contingency plan.

10. Has your facility corrected all instances of potential environmental non-compliance and EMS non-conformance identified during your audits and other assessments?  
☒ Yes—If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s).  
Electronic Document Controls were revised to be less cumbersome.  
Environmental aspects and impacts spreadsheet was revised to include a soldering operation  
☐ No—If no, please explain your plans to correct these instances.  
☒ No such instances identified.

11. (Optional) Please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as an Environmental Performance Initiative in Section E. You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the last calendar year. Attach additional sheets as necessary.

Environmental aspect	Progress made this year (e.g., quantitative or qualitative improvements, activities conducted)

**SECTION D****ADDITIONAL INFORMATION****Why do we need this information?**

This information will help IDEM to effectively manage the Environmental Stewardship Program.

**What do you need to do?**

Answer the questions as completely as possible.

- In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve months.  
 In 2013 a Liberty Mutual Gold Safety Excellence Awards was presented for Safety Excellence. Maintained as a member of the Partners for Pollution Prevention and the Central Indiana Clean Air Partnership, 2013 Energy Star and EPA's Waste Wise - Indianapolis is an active participant in both programs.
- Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.  
 The site took advantage of an expedited air permit modification.
- If your facility was not registered to the ISO 14001 standard prior to becoming an ESP member, has ESP helped you to pursue registration? If so, how has ESP been instrumental in achieving registration?  
 No.

**SECTION E****ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS****Why do we need this information?**

Facilities need to share the results of the environmental improvement initiative that was pursued during the reporting period.

**What do you need to do?**

Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR.

Category: Indicator:	Baseline Quantity	Future Goal Quantity	Current Quantity	Cost Savings
Calendar year	2012	2013	2013	\$35,585
Actual quantity (per year)	1379	1129	150	
Normalized quantity (per year)				
Basis for your normalizing factor (e.g., gallons of paint produced)				
Measurement unit (e.g., pounds)	Pounds			

Briefly describe how you achieved improvements for this environmental initiative or, if relevant, any circumstances that delayed progress.  
 The primary objective of the project was to eliminate an air handling unit (AHU) that used refrigerant R-22. This AHU was used to false load existing chillers to prevent the existing chillers at the facility from short cycling. Eliminating this AHU will reduce maintenance, refrigerant and energy usage. \$4,200 was saved in maintenance cost, \$2,085 was eliminated from purchasing additional R-22 refrigerants and we had energy savings of \$29,300. All three costs have been eliminated so annual savings and all three would continue to increase - especially the R-22.

Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL).



N/A

(Optional) If your facility has experienced continued results for environmental improvement initiatives pursued in past years of ESP membership, please share those results here.

## SECTION F

## ENVIRONMENTAL IMPROVEMENT INITIATIVE

## Why do we need this information?

Facilities need to show they are committed to improving their environmental performance.

## What do you need to do?

Refer to the Environmental Performance Table and answer the following questions.

1. Select the appropriate boxes in the following table to indicate the **category** and **indicator(s)** that represents the environmental improvement initiative selected by your facility. For the category and indicator selected, list the **baseline year** (e.g., 2009) and the **future year** (e.g., 2010). Next, list the **baseline annual quantity** (e.g., 5 tons) and **future annual quantity** (e.g., 2 tons) you are committing to achieve by the end of the future year.

Category	Indicator	Baseline Year 2013	Future Year 2014	Unit
<input type="checkbox"/> Material Procurement	<input type="checkbox"/> Recycled content			Pounds, tons
	<input type="checkbox"/> Hazardous/toxic components			Pounds, tons
<input type="checkbox"/> Suppliers' Environmental Performance	<input type="checkbox"/> Specify indicator: _____			As specified for the particular indicator
<input type="checkbox"/> Material Use	<input type="checkbox"/> Materials used			Pounds, tons
	<input type="checkbox"/> Hazardous materials used			Pounds, tons
	<input type="checkbox"/> Ozone depleting substances use			CFC-11 equivalent pounds
	<input type="checkbox"/> Total packaging materials used			Pounds, tons
<input type="checkbox"/> Water Use	<input type="checkbox"/> Total water used			Gallons
<input checked="" type="checkbox"/> Energy Use	<input checked="" type="checkbox"/> Electricity	95 MWh	0 MWh	kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Steam			kWh / MWh, gallons, ft <sup>3</sup>
	<input checked="" type="checkbox"/> Natural gas	325 mm BTU	0 BTU	Btu / MMBtu
	<input type="checkbox"/> Diesel			Gallons
	<input type="checkbox"/> Propane / LPG			Btu / MMBtu, gallons
	<input type="checkbox"/> Gasoline			Gallons
	<input type="checkbox"/> Solar			kWh / MWh
	<input type="checkbox"/> Wind			kWh / MWh
	<input type="checkbox"/> Landfill gas			Btu / MMBtu
	<input type="checkbox"/> Combined heat and power			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Other: _____			_____
<input type="checkbox"/> Land and Habitat	<input type="checkbox"/> Land and habitat conservation			Square feet, acres
	<input type="checkbox"/> Community land revitalization			Square feet, acres
<input type="checkbox"/> Air Emissions	<input type="checkbox"/> Total GHGs			MTCO <sub>2</sub> E
	<input type="checkbox"/> VOCs			Pounds, tons
	<input type="checkbox"/> NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>2.5</sub> , PM <sub>10</sub> , or CO			Pounds, tons
	<input type="checkbox"/> Air toxics			Pounds, tons
	<input type="checkbox"/> Odor			European Odour Units
	<input type="checkbox"/> Radiation			Curies, Becquerels
	<input type="checkbox"/> Dust			Pounds, tons
<input type="checkbox"/> Discharges to Water	<input type="checkbox"/> COD or BOD			Pounds, tons
	<input type="checkbox"/> Toxics			Pounds, tons
	<input type="checkbox"/> Total suspended solids			Pounds, tons
	<input type="checkbox"/> Nutrients			Pounds, tons of N or P
	<input type="checkbox"/> Sediment from runoff			Pounds, tons
	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
<input type="checkbox"/> Non-hazardous Waste	<input type="checkbox"/> Landfill			Pounds, tons
<input type="checkbox"/> Hazardous Waste	<input type="checkbox"/> Incineration			Pounds, tons
	<input type="checkbox"/> Reused/recycled off-site			Pounds, tons, gallons
	<input type="checkbox"/> Other: _____			Pounds, tons, gallons
<input type="checkbox"/> Noise	<input type="checkbox"/> Noise			dBA
<input type="checkbox"/> Vibration	<input type="checkbox"/> Vibration			Inches per second
<input type="checkbox"/> Products	<input type="checkbox"/> Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Expected lifetime water use			Gallons
	<input type="checkbox"/> Expected lifetime waste to air,			Pounds, tons

	water, or land from product use			
	<input type="checkbox"/> Waste to air, water, or land from disposal or recovery			Pounds, tons

2. What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? Elimination of false loading to our Central Plant

3. Does this initiative address a significant aspect in your EMS?

☒ Yes

☐ No—If no, please explain why you believe this indicator should be included as an environmental improvement initiative: \_\_\_\_\_

#### CERTIFICATION AND PLEDGE

On behalf of (name of facility) Raytheon Intelligence, Information and Services (IIS), Systems Modernization and Sustainment (SMS), Indianapolis

I certify that the information contained in this Annual Performance Report and attachments is accurate to the best of my knowledge and that this facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with all applicable federal, state, and local environmental requirements, or has a corrective action program in place to attain compliance.

We, Raytheon IIS, SMS, Indianapolis, commit to maintaining the principles and goals outlined in our Environmental Management System for our facility's Indiana Environmental Stewardship Program status. We agree to strive for full compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We agree to promote the Indiana Environmental Stewardship Program and to share our success stories with other facilities. We understand that the Annual Performance Report must be submitted to IDEM by April 1<sup>st</sup> of each year and that we must reapply to the Indiana Environmental Stewardship Program every three years.

I understand that the information provided in this Annual Performance Report will be public record. I am the senior facility manager or authorized facility signatory, and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is submitting this Annual Performance Report.

Signature

Title

Date (month, day, year)

Vice President IIS, SMS

March 28, 2014

Printed signature  
Rudolph Lewis





Indianapolis, IN  
Evansville, IN  
Fort Wayne, IN  
Birmingham, AL  
Newark, DE



03-26-14 P02:17 IN  
CORPORATE OFFICE  
5257 West 74th Street  
Indianapolis, IN 46278  
phone 317.472.0999  
fax 317.472.0993  
www.wilcoxenv.com

August 26, 2013

Raytheon Technical Services Company, LLC  
6125 East 21<sup>st</sup> Street  
Indianapolis, Indiana 46219  
Attn: Mr. Larry Bryan

RE: Environmental Management System Audit  
Raytheon TSC  
Indianapolis, Indiana  
Wilcox Project # 270.13

Dear Mr. Bryan:

Wilcox Environmental Engineering, Inc. (Wilcox) conducted an independent Environmental Management System (EMS) audit on June 28, 2013 of the Raytheon Technical Services Company, LLC (Raytheon). The purpose of the audit was to assess the completeness and performance of the system. Because the Raytheon facility is not considered an International Standards Organization (ISO) Document 14001 facility, this audit was not performed to meet those particular requirements. However, the general structure of ISO 14001 EMS were employed as well as the Indiana Environmental Stewardship Program's Independent Assessment protocols to evaluate the Raytheon EMS.

Accordingly, the following elements were evaluated:

### **Scope**

The scope of the Environmental Management System includes all of the facility located at 6125 East 21st Street, Indianapolis, IN 46219 and associated activities occurring within the plant and associated grounds of the Indianapolis facility.

### **Change Management**

The facility does have a procedure for managing change and assessing the impacts associated with the changes. The facility uses a Gate Process to review and assess the potential impacts associated with any changes. The process was reviewed and evidence indicated the process is being used effectively.

### **EMS Implementation**

The EMS has been fully implemented at the facility. The facility has documented Roles and Responsibilities, regular training is conducted, goals and objectives are documented annually and reviewed monthly, and regular management reviews are conducted.

## **Environmental Policy**

The Environmental Policy was reviewed and found to be compliant with the requirements of the standard. The policy is communicated with all employees and posted in the facility.

## **Legal and Other Requirements**

Legal and other requirements are tracked through the use of a Compliance Calendar which appears to identify applicable requirements for the facility. The facility utilizes several resources for identifying potential changes to these requirements. The tools include Corporate Guidance and BNA subscription among others. Requirements are reviewed at least annually.

## **Environmental Aspects and Impacts**

The facility maintains a spreadsheet of the environmental aspects and impacts and utilizes the Liberty Mutual R3 risk rating service. It was noted that the soldering operation was not identified on the list.

**Recommendation:** Wilcox recommends reviewing the Environmental Aspects and Impacts to ensure they include all applicable operations conducted at the facility.

## **Objectives and Targets**

Objective and Targets are set annually and involve tracking for tons recycled, total solid waste, Recycle percent, Solid waste incineration. Spreadsheets are used to track energy and water usage and a waste minimization team is established to drive the efforts. Monthly meetings are conducted utilizing the EHS and Sustainability Operating Review Chart for tracking the progress of the goals and objectives.

## **Environmental Management Programs**

The facilities environmental management programs are effective towards meeting the facilities goals and objectives. The facility maintains a waste minimization team to track and maintain the programs for achieving the facility's goals. The programs are tracked utilizing the EHS and Sustainability Operating Review Chart. Monthly meetings are conducted to review the programs and the progress towards achieving the facility's goals.

## **Structure and Responsibility**

The facility has defined Roles and Responsibilities with assigned authority for managing and approving environmental performance, ensuring compliance, and outreach and communication of performance. The Roles and Responsibilities are well documented in written procedures and are reviewed annually.

### **Training, awareness, and Competence**

A training matrix is utilized to identify the training requirements for employees. Management of the training is tracked through a computerized Learning Management System (LMS).

### **Communication**

The facility conducts meetings and training for employee that effectively communicate the facility's environmental and EMS information internally. In addition to training, the facility posts information related to the environmental performance and EMS throughout the facility.

### **EMS Documentation**

The facility maintains an electronic document system named EPAL, Enterprise Process Asset Library. All documentation related to the EMS is maintained and tracked on the EPAL system.

### **Document Control and Records**

Document control procedures were reviewed and found to be sufficient. The facility uses the EPAL system for identifying and controlling documents. It was noted that finding some documents may be cumbersome in the EPAL system.

**Recommendation:** Wilcox recommends developing a master document list that can be used tracking and identifying the current revisions and the location of each document.

### **Operational Control**

Operational controls used to ensure the equipment and operations comply with legal requirements were reviewed. Procedures are well defined and communicated. Several procedures related to the facility's air permit, SPCC plan, and SWPPP were reviewed as evidence.

### **Emergency Preparedness and Response**

The facility maintains procedures for handling a variety of emergency situations that may arise at the facility. The procedures sufficiently identify potential accidents and contain procedures for preventing potential for accidents and mitigating the impacts of any accidents that may happen. The facility periodically reviews the emergency procedures and updates as needed. Additionally, whenever an incident does happen the facility completes an incident report and reports all findings and corrective actions, which may include updating of written procedures.

### **Monitoring and Measurement**

The facility has a matrix identifying the requirements under monitoring and measuring. Evidence was reviewed that indicated needed processes were in place to appropriately monitor compliance with regulatory requirements. For instance an Access database is used to

demonstrate compliance with the 15#/day limit on VOCs from the painting operation. Procedures for monitoring and measuring key performance indicators such as solid waste, water and energy use are effectively tracked and monitored monthly using the EHS and Sustainability Operating Review Chart.

### **EMS and Compliance Audits**

The facility regularly conducts audits to ensure the facility remains in compliance with applicable legal and other requirements as well as conformance to their EMS. Audits are conducted both internally and at the corporate level. Personnel conducting the audits are appropriately trained. Additionally the facility uses outside consulting firms to conduct compliance audits.

### **Corrective and Preventative Action**

The facility has a procedure in place to handle and track all correctives actions. Any issues are handled as an incident and tracked and communicated through the facilities incident reporting procedures.

### **Management Review**

Management reviews are conducted on a monthly and yearly basis. A review of the Operating Review document was reviewed and found to be in compliance with the requirements of the standard. The review includes senior management personnel, a review of the facility's environmental programs, and goals and targets. The reviews are documented using the Operating Review document.

As a part of this audit, an environmental compliance review was also conducted for the following areas:

- **Air Permitting** – The facility currently operates under a Federally Enforceable State Operating Permit (FESOP). The permit and an associated emission inventory calculates the facility's potential to emit, inventories stacks and evaluates the applicability of federal requirements. Emissions are calculated quarterly as required by the permit and submitted to the appropriate agency. Documentation was reviewed showing compliance with the requirements of the permit.
- **Community Right-To-Know Reporting** – The facility has completed both Tier II and Form R reporting within the appropriate timeframes. The reports document those chemicals that exceed the applicable thresholds.
- **Hazardous and Non-Hazardous Waste Management** – All wastes disposals are properly documented on manifests. Waste disposal is annually reported to the state agency based upon the data reported on the manifests. Characterization of each waste stream is reviewed at least every other year. Satellite storage areas are regularly inspected.



- **Stormwater Management** – The facility operates under a general stormwater permit. As required annual sampling is completed, and the results reported to the state agency. The facility has operates under a stormwater pollution prevention plan, with periodic inspections of the potential pollution sources. Documentation was reviewed indicating monthly inspections are conducted and the discharge monitoring report and Annual Report were both submitted timely.
- **SPCC Plan** – The facility has developed a Spill, Prevention Control and Countermeasure (SPCC) Plan, which is properly certified by facility personnel and a Professional Engineer. The Plan documents oil storage in the facility and provide for periodic inspection of the storage areas. Documents were reviewed indicating required inspections are regularly conducted. Due to recent changes at the facility, the SPCC plan and is currently be revised to reflect current conditions.
- **Wastewater Management** – The facility is a zero discharge facility and does not require a wastewater permit.

Thank you for the opportunity to offer our services. Should you have any questions, please feel free to contact this office at your convenience.

Sincerely,

**WILCOX ENVIRONMENTAL ENGINEERING, INC.**



Aaron M. Miller, CIH  
Sr. Project Manager



